

Bright.Blue UK Limited

SUPPLIER CODE OF CONDUCT



bright.blue

CONTENTS

CLAUSE

| | | |
|----|---|---|
| 1. | ABOUT THIS CODE OF CONDUCT AND ETHICS | 1 |
| 2. | WHO THIS CODE APPLIES TO | 1 |
| 3. | HUMAN RIGHTS AND WORK CONDITIONS | 1 |
| 4. | BUSINESS PRACTICES | 2 |
| 5. | REPORTING..... | 3 |
| 6. | PROCESS FOR REVIEW | 3 |

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Opening statement

Bright.Blue is committed to operate within the spirit and letter of the law and to maintain high ethical standards wherever we conduct business. Bright.Blue does not condone or tolerate efforts or activities to achieve business results through illegal or unethical dealings. Our collaborators, customers and suppliers know that we are concerned not only with results, but also with how those results are achieved.

We acknowledge that Bright.Blue people are key to driving the social and environmental performance. A fundamental part of our culture is empowering our Bright.Blue people as well as our Suppliers to drive positive change. By supporting a culture of disruptive innovation, we believe we can find creative solutions that address global social and environmental challenges and create a better world for our people, our clients, our business and our communities.

1. ABOUT THIS CODE OF CONDUCT AND ETHICS

The purpose of this supplier code of conduct and ethics (Supplier Code or Code) is to explain our values and how they relate both to our day-to-day work and the key ethical issues Bright.Blue requires its suppliers to handle.

Suppliers are expected to be aware of, understand and build processes to comply with applicable laws in jurisdictions where it operates or conducts business. Where the provisions of law and this Supplier Code address the same subject, to the extent legally permitted, Suppliers should apply the provision which furthers the intent of this Supplier Code to the greater degree. Every Supplier is expected to meet these standards in connection with the operations of its business. Suppliers should establish and enforce policies which comply and align with the expectations of this Supplier Code. Suppliers are also expected to apply comparable standards downstream in their own supply chains.

2. WHO THIS CODE APPLIES TO

- 2.1 This Code applies to any organization that (i) contracts with Bright.Blue to supply goods or services to Bright.Blue, (ii) contracts with Bright.Blue for the purposes of serving Bright.Blue clients, or (iii) has entered into a business relationship with Bright.Blue to establish eminence in the marketplace, including alliance relationships and reselling relationships (“**Supplier**”).

3. HUMAN RIGHTS AND WORK CONDITIONS

3.1 Humane treatment

Supplier shall treat workers with dignity and respect and not subject them to demeaning conditions.

3.2 Discrimination, harassment and bullying

We require our Suppliers to be committed to providing a working environment free from harassment and bullying and ensuring all staff are treated and treat others, with dignity and respect. Supplier shall foster a culture and workplace that does not tolerate harassment, including sexual harassment, threats of harassment, or retaliation for reporting harassment.

3.3 Forced Labour

Supplier shall not use forced or involuntary labour nor demand work/service from an individual under threat or coercion. Work must be conducted based on freely agreed terms. Supplier shall not withhold or destroy, conceal, confiscate or deny access by workers to workers' identity or immigration documents. Supplier shall not require nonprofessional migrant workers to bear any costs or fees associated with their recruitment, travel or migration processing.

3.4 Child Labour

Supplier shall not exploit child labour and shall not employ any workers under the age of 15 or the minimum legal working age, whichever is greater. Employment of workers under the age of 18 should not interfere with their compulsory education and should not, by the nature of the work or the circumstances in which it is carried out, be likely to harm their health, safety, or morals.

3.5 Wages, working hours and other conditions

Supplier shall meet applicable standards regarding working conditions across its entire workforce, including, without limitation, laws, regulations, and standards relating to the payment of the minimum legal wage or a wage that meets local industry standards, whichever is greater; the observation of legally mandated break and rest periods; and the health and safety of the workers in the workplace.

3.6 Freedom of association and nonretaliation

Supplier should nurture an environment where business standards are clearly understood and there are clear channels for individuals to communicate openly with management without threat of retaliation, intimidation, or harassment. Additionally, Supplier should respect the legal rights of workers to freedom of association and not hinder the rights of workers to legally organize and join associations.

4. BUSINESS PRACTICES

4.1 Conflicts of interest

Supplier shall not allow bias, conflict of interest, or inappropriate influence of others to override its professional judgments and responsibilities. Supplier shall voluntarily declare any such conflicts involving Bright.Blue personnel.

4.2 Bribery and corruption

Supplier shall neither make bribes nor accept them, nor induce or permit any other party to make or receive bribes on its behalf nor cause other parties, including Bright.Blue, to violate any applicable anti-corruption or antibribery laws when working on behalf of or with the other parties including Bright.Blue. Supplier shall use reasonable practices to prevent bribery in all forms and shall support efforts to fight corruption. Supplier shall not engage in or assist any third party with any money laundering, terrorist financing or other financial crime activities.

4.3 Gifts and hospitality

Supplier shall not offer, accept or solicit any gifts, entertainment, or hospitality whereby there is reason to believe, or a reasonable and informed third party would likely conclude, that there may be intent to improperly influence decisions or impair objectivity related to its business dealings.

4.4 Anti-money laundering, Business Integrity

Supplier shall not engage in any illegal or unethical behaviour including money laundering. Supplier is expected to uphold standards of fair business practices. Supplier shall endeavour to maintain its own confidential process to enable employees and contractors to report incidents of unethical behaviour.

4.5 Environmental operational compliance

Supplier shall seek to improve resource efficiency and reduce resource consumption including of raw materials, energy, water, and fuel. Supplier is expected to make reasonable efforts to eliminate or reduce levels of waste (both solid and wastewater) generated and to increase landfill diversion, reuse, and recycling. Supplier is encouraged to develop and use environmentally friendly innovations and practices that reduce negative environmental impacts.

Supplier shall take reasonable steps to minimize emissions of greenhouse gases and of toxic and hazardous pollutants. Supplier is encouraged to track greenhouse gas emissions and to set science-based (in line with the Paris Agreement) greenhouse gas reduction goals.

5. REPORTING

5.1 To report questionable behaviour or a possible violation of this Supplier Code, you are encouraged to work with your primary Bright.Blue contact resolving your concern.

6. PROCESS FOR REVIEW

6.1 This Code will be reviewed annually or as required following:

- Any legislative changes or changes to industry guidance that might impact on it.
- Any changes to other associated internal policies, processes or procedures.
- Any breach or other incident relating to the issues addressed in this Code.

This Supplier Code is available at your Bright.Blue contact or on the <https://bright.blue> website.